



CAPCOA Enforcement Managers Committee Meeting
April 12, 2018 – 10:00 am to 5:00 pm
April 13, 2018 – 8:00 am to 11:30 am
Chico, CA

MEETING NOTES

Thursday, April 12, 2018 @ 10:00 AM

I Welcome and Introductions

Juan Ortellado

Agenda Additions/Changes

Review/Approval of January 2018 Meeting Minutes ---approved

Review Upcoming Enforcement Meeting Dates/Locations

- July 26 - 27 - San Diego (Downtown)
- October 4 - 5 – South Lake Tahoe
- January 2019: TBD.

II Review of Outstanding Action Items

Ryan Hayashi

ACTION ITEM	ASSIGNED	DATE	STATUS	NOTES
2018 Engineering/Enforcement Symposium	All	TBD	In Progress	Need to decide about future event(s). No CAPCOA funding currently available for a large symposium.
Find a Vice Chair and Secretary for the Vapor Recovery Subcommittee.	Ortellado	January 2018	Complete	Volunteers filled open posts.
Kelly Weatherford, ARB, to coordinate training on the PERP DMS.	ARB	January 2018	Complete	ARB conducted two training sessions, one in December 2017 and another in early January 2018.
ARB grants for GHG O&G Regulation for the Districts. Grant agreement template for District's going to be enforcing CARB's Oil & Gas GHG Regulation.	ARB (Jim Nyarady)	TBD	In Progress	ARB to provide status update.
Enforcement Statistics.	All Districts	6/1/18	In Progress	Districts to submit their respective enforcement statistics to Mike Goldman by no later than 6/1/18.

CAPCOA ENFORCEMENT MANAGERS - MEETING NOTES

				[HYPERLINK "mailto:goldmanm@sbcapcd.org"]
ARB looking for Subject Matter Experts for the Training Workgroup.	ARB (Leisa Bush)	February 2018	In Progress	ARB to provide status update.
Enforcement symposium survey will be distributed to the Districts.	Pinnow	March 2018	Complete	

III Vapor Recovery Sub-Committee Update

Lou Dinkler/George Lew

Regulatory Proposal for Phase II Requirements for Aboveground Storage Tanks

- EVR Phase II rulemaking to commence.
- Background - CARB adopted AST standards:
 - ✓ PH II by 2019 - All ASTs required to upgrade to EVR PH II under current reg.
 - ✓ AST PH II upgrades may not be cost effective for most tanks.
- ARB has worked with districts and stakeholders:
 - ✓ Working group.
 - ✓ Surveyed distributors.
 - ✓ Analyzed data and established new cost-effectiveness threshold for upgrades.
 - ✓ Proposed regulatory concepts.
 - ✓ Received comments from districts.
- Discussion of a "Districts Proposal".
- There are differences between ARB and Districts proposals.
- Enforcement Managers group may not agree with or approve VR Sub-Committee proposal.
- Implications - Districts may have to revise their rules to agree with the proposed ARB rule.
- Group discussion of Districts proposal vs. ARB proposal.

Update of Field Evaluation and Regulatory Proposal to Standardize Nozzle Spout and Vehicle Fill Pipe Dimensions:

- ISD Operational Alarms – Short and long-term solutions.
 - ✓ Short term - Nozzle /fill pipe specs-workshops in May and to ARB Board in Oct. 2018.
 - ✓ May23 - Public workshop in Diamond Bar.
 - ✓ Why? Compatibility issues with fill pipe designs and nozzles.
 - ✓ Many related tests/meetings over the years.
- ARB invited to participate in SAE Fuels System Task Force -
 - ✓ Proposed new spout and boot dimensions.
 - ✓ Cost and benefits-low costs, ~1.4 TPD emission reductions; full implementation by 2023
 - ✓ ~1.4 TPD emission reductions from EOR Nozzles.
- Discussion regarding how to incentivize dealers to do early replacement.

Winter field study 2017-2018 results:

- Balance system
 - ✓ Expanded current study 2017-2018.
 - ✓ More and varied sites.
 - ✓ 10% failed dynamic test due to kinked hoses.
 - ✓ All ISD systems passed.
 - ✓ 92% data capture rate.
- Preliminary conclusions:
 - ✓ VDAPP latest results = 11%.
 - ✓ RIFE emissions-low emissions overall.
 - ✓ Pressure driven emissions generally low about 5% or 2 TPD statewide.
 - ✓ Varies from site to site – health risk assessments may be needed case by case.

IV Portable Equipment Update

Mike Guzzetta/Kelly Weatherford

- Regulatory package should go to OAL By June 2018.
- ARB is getting ready to implement the new regulation.
- Placards, conditions, eligibility requirements discussed.
- DMS walk-throughs to be held in June & January.
- Working on a “delete” functionality for districts for the DMS.
- Reminder - proposed regulation is not effective yet and can’t be enforced.
- Group discussion of new suction-type excavator found at Yolo-Solano – Permit or not?

V CARB Open Floor Updates

Steve Brisby/Jeff Lindberg

- Jeff Lindberg updated on District Support Section.
- ARB needs to learn what districts are doing and how they do it to help districts (Liaison with districts).
- Discussion of oil and gas work to be done by ARB.
- Cap & Trade mandatory reporting cases will be a focus of the Enforcement Support Branch.
- Last year: ARB made 214 RMP contacts.
 - ✓ Still requiring registration for those without registration.
 - ✓ Allowing registration for facilities w/o penalties.
- Some large companies haven’t registered their many facilities.
- Will be reassigning ARB staff to do GHG stationary source enforcement.

VI Engineering Committee Update (conference line)

Arnaud Marjollet

- Next meeting is in Fresno at the end of April 2018.
- AB617 discussions - BARCT, Emissions reporting in addition to AB2588 reporting.
 - ✓ Working with ARB to be sure there is an efficiency of reporting.
 - ✓ Establishing AB617 thresholds.
- O&G GHG Regulation discussion-implementation.
- Cannabis – processing cannabis may be subject to permit requirements.
- Growing is trickier - legality is different at different government levels.
- Wood waste pyrolysis.
- Wineries and fermentation tanks.

VII USEPA Open Floor Update Report

Andrew Chew

- Lots of inspections performed:

CAPCOA ENFORCEMENT MANAGERS - MEETING NOTES

- ✓ Defeat devices-diesels and aftermarket parts.
- ✓ Truck and bus help to ARB - out of state companies.
- Mobile Sources
 - ✓ Import cases-illegal engines.
 - ✓ Port shopping importers looking to find new ports with less scrutiny, so EPA is expanding work to more ports.
- Offer to the group to use FLIR camera.
- If you see diesels/gensets with sticker that claims: "Not legal for U.S. – Export only", please let EPA know.

VIII CARB Training Update

Leisa Bush

- VEE – Some staff may be cheating. Enf. Group requested ARB to notify districts when that occurs.
- Subject matter expert-survey sent out. Haven't heard from everyone yet.
- What to do with list of experts and how to add "new" experts or experts-to-be.
- PERP Classes – Joseph Gormley has 9 training sessions scheduled.
- GDF classes - Darci and Joseph working on ISD class.
- Asbestos training – New contract for 4 classes this year with Bob Trotter.

IX ARB/CAPCOA Enforcement Symposium

Juan Ortellado/All

- No funding available for separate symposium this year.
- Group discussion of alternatives.
- Engineering meeting is usually 1.5 days. Normally about \$100.00 registration fee. Fewer, but more in-depth topics this year.
- Additional discussion Friday:
 - ✓ There used to be a "Symposium" associated with the Enforcement Managers Committee meeting.
 - ✓ Separate site or same site as Enforcement Managers meeting site?
 - ✓ South Lake Tahoe location discussed.
 - ✓ More central location discussed.
 - ✓ Survey needed?

X Diesel Regulations/MOU (conference line)

Kristen McKinley/Tim Gergen

- 2,400 Notices of Non-Compliance sent out for 5,100 vehicles.
- 1,662 NOVs issued for non-compliance with Truck and Bus regulation.
- Much more contact work now.
- Allocating more resources to enforcement and adding staff.
- Will be focusing on shipping distribution centers located in EJ areas.
- Inspections - within 2 months.
- Currently working in Oakland on sensor testing at busy intersections.

XI Oil & Gas Regulation (conference line)

Jim Nyarady/Elizabeth Scheele

- Grants-SJVAPCD is the test case.
- Grant money coming to Districts must be encumbered by June 30, 2018.
- Training - 3rd party training contract has been approved, but waiting for equipment that was ordered.
- 3 sessions to be held: Northern, Central, & Southern Calif.

XII Agricultural Burning

Emmanuel Sanchez/All

CAPCOA ENFORCEMENT MANAGERS - MEETING NOTES

- Imperial County has many open burning issues at the city-agricultural area interface.
- Seeking input on how to allow burns or how to restrict burns to avoid public nuisance issues.
- Input from districts with experience with this issue.

XIII Cannabis

All

- Group discussions regarding cannabis cultivation and processing.
- The agreement seems to be that cannabis processing may require local district permits, depending on the process: engines, use of solvents, etc.
- Growing may not require permits. Could be treated like ag.

XIV Review of Thursday Action Items

- EPA request: Please forward info to EPA you may have about illegal ICEs with above-mentioned labels.
- Reporting districts GHG - Jim Nyarady O&G work group.
- Grant contracts-Districts signing O & G MOA need to submit.

Friday, April 13, 2018 @ 8:00 AM

XV Welcome and Introductions - Agenda Additions/Changes

Juan Ortellado

- Agenda Additions/Changes?

XVI South Coast AQMD Enforcement Update

- Coastal area odors:
 - ✓ 133 complaints this quarter around coastal communities.
 - ✓ Have not been able to verify source yet.
 - ✓ Maybe off-shore source?
- Paramount-Compton - monitors in place but seeing sporadic readings.
- Rule 1420.2-lead rule work.
 - ✓ Monitors triggered.
 - ✓ Working to remedy causes, not any single cause.

XVII Sharing District Policies and Practices (Cont. from last meeting)

Jeff Pinnow/All

- Working on document sharing, will resume after budget season.
- CAPCOA website? Dropbox? Some concerns with the cloud.
- Group discussion regarding options for document sharing and a "forum".
- Group discussion regarding public records requests.
- Common topics of interest:
 - ✓ Public Nuisance.
 - ✓ Mutual Settlement and Penalty.
 - ✓ Enforcement Coordination and DA referral
 - ✓ Permit Suspension
 - ✓ Inspection Forms and Templates

XVIII Oroville Dam Updates

David Lusk/Stephen Ertle BCAQMD

- 2 spillways in place.

CAPCOA ENFORCEMENT MANAGERS - MEETING NOTES

- Emergency event 2-7-2018.
- Eroded soil that contained asbestos.
- NOA and issues with dust mitigation plan & enforcement.
- 12-month timeline coming up in May- will have district permitting implications.

XIV Landfill Methane

Steve Brisby

- 160 landfills in California must comply with GHG Regulation.
- 153 of these landfills are in districts with signed MOU.
- Nasa/JPL flyover data from 2016.
 - ✓ Airplane with sensors.
 - ✓ Maps showing methane plumes in California.
 - ✓ ARB Has data on every site.
 - ✓ Arb intends to visit sites and try to determine why?
 - ✓ John Abbey 916-229-0378

CAPCOA-ONLY PORTION OF MEETING

XV Rural District Issues/Enforcement Case Roundtable

All

- Districts discussed ongoing compliance issues and local concerns.

XVI Review of Friday Action Items

Ryan Hayashi

- Send links to your on-line District policies to Juan to send to the rest of the Committee.
- David Lusk and Amy Roberts to send out a list of questions and information to Ryan Hayashi to facilitate the creation of a survey about a symposium this year.
- Set up a conference call between Enforcement Managers and GDF Sub Committee to discuss proposal made to CARB (Chair of the Sub Committee is out for the next 2 months).

ADJOURN